



To:

19.09.2023

The Secretary,

The Honourable Telangana State Electricity Regulatory Commission Vth Floor, Singareni Bhavan, Red Hills, Hyderabad.

#### From:

**Orient Cement Limited**,

Office at: 5-9-22/57/D, 2<sup>nd</sup> and 3<sup>rd</sup> & 4<sup>th</sup> Floor, G P Birla Centre, Adarsh Nagar, Hyderabad, Telangana – 500063.

Represented by Atul Kumar Agrawal Asst Vice President (Elect.) Orient Cement Devapur Distt Mancherial Contact No 9505678641

Respected Sir,

In the matter of SUO MOTO Determination of compliance of Renewable power purchase obligation of obligated entities for FY 2019-20(including the shortfall of FY 2018-19) FY 2020-21(including shortfall of FY 2018-19 & FY 2019-20), FY 2021-22(including the shortfall of FY 2018-19,2019-20,2020-21) The same are enclosed within. You are kindly requested to take the same on record.

Regards,

For orient Cement Ltd. Atul Kumar Agrawal

Orient Cement Devapur

Mancherial

Copy to:

1. Chief Engineer -SLDC, TSTRANSCO, Vidyuth soudha, Hyd-500082.

Orient Cement Limited

Devapur Plant: PO Devapur Cement Works, Adilabad (District), Telangana 504218, India.

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# BEFORE THE HON'BLE TELANGANA ELECTRICITY REGULATORY COMMISSION: SINGARENI BHAWAN, RED HILLS: HYDERABAD

## In the matter of:

SUO-MOTO -DETERMINATION OF COMPLAINCE OF RENEWABLE POWER PURCHASE OBLIGATION OF OBLIGATED ENTITIES FOR FY 2019-20(including the shortfall of FY 2018-19). FY 2020-21(including shortfall of FY 2018-19 & FY 2019-20), FY 2021-22 (including the Shortall of FY 2018-19,2019-20,2020-21).

## **OBJECTIONS**

In accordance with the provisions of the Regulation No.2 of 2018 (TSERC Renewable Power Purchase Obligation (Compliance by purchase of Renewable Energy/Renewable Energy Certificates) Regulations, 2018

Under regulation no 2 of 2018 we have submitted our Renewable power purchase obligations; we M/s Orient cement ltd have purchased RECs based on captive consumption from 1st to Month end of every financial year. The data which is reflected on TSERC site is based on 21st to 21st of every financial year. Earlier it wouldn't make much difference as in cumulative self-consumption got matched but in FY 2019-20 due to covid lockdown our plant got stopped in the last week of march-2020 , self-consumption of M/s orient cement ltd is given as 209772.62 MWH( These readings are as per joint meter readings on 21st of every month which we have sent the data to TSNPDCL) but self-consumption is 203581.260MWH( these consumption details are of 1st to end of the month).

				Based on 1st to month end	
FY	CPP Self consumption from 1st to month end in MWH	REC's PURCHASED			
		Solar (Qty)	Non-Solar (Qty)	Solar	Non-Solar
FY 18-19	235666.954	12650	1600	12561.05	1578.97
FY 19-20	203581.260	11758	1493	11746.64	1486.14
FY 20-21	158960.440	9872	1256	9871.44	1255.79
FY 21-22	189534,920	13469	1708	13456.98	1705.81
	CEMEN	47749	6057	47636.11	6026.71

				Based on 21st to 21st reading	
FY	Cpp Self consumption from 21st to 21st in MWH	REC's PURCHASED			
		Solar (Qty)	Non Solar ( Qty)	solar	Non solar
FY 18-19	236284.235	12650	1600	12593.94973	1583.104375
FY 19-20	209772.622	11758	1493	12103.88029	1531.340141
FY 20-21	150218.679	9872	1256	9328.579966	1186.727564
FY 21-22	191569.326	13469	1708	13601.42215	1724.123934
		47749	6057	47627.83213	6025.296013

Please find the attached data sheet for FY 2018-19 to 2021-22, as per self-consumption total REC's purchased were fulfilled for both base type of readings whether it may be  $1^{\text{st}}$  to month end or  $21^{\text{st}}$  to  $21^{\text{st}}$  of every month.

As per LR.No.CE/SLDC/REC/F.RPPO/D.No.284/23, Dt:- 05.08.2023, we found for M/s Orient Cement ltd shortfall REC's for FY 2019-20 i.e Solar – 345 no's and Non -Solar-38 no's.

Kindly consider the above data and consider that M/s Orient cement ltd for FY 2018-19 to FY 2021-22 in both the aspects we have purchased excess and make the change that M/s Orient cement ltd has no short fall for FY 2019-20.

#### **RPPO for FY 2023-24**

As per regulation no 7 of 2022 to fulfil RPPO for FY 2023-24 we need to purchase solar -8.0 % and non-solar-1.25% of captive consumption.

But as per the subjected circular received form IEX on dated 26.12.2022. REC's will be allocated based on availability.

As per circular from IEX, we may not be able to fulfil RPPO according to the solar and non-solar percentages as per regulation no 7 of 2022.

Due to this issue, we have purchased RECs through REC trade under bilateral mechanism. It is pertinent to mention that the Obligated Entities has to fulfil Renewable Purchase Obligation (RPO) through procurement of renewable power or Purchase of Renewable energy certificates (RECs).

It is to share, the Recent CERC Regulation "Terms and Conditions for Renewable Energy Certificates for Renewable Energy Generation Regulations 2022"dated 9<sup>th</sup> May'2022 notified the Rules and Regulations for RECs on Bilateral basis.

For every financial year we recommend to give grace period of one month so that we can purchase exact REC's for fulfillment of RPPO, as whenever we are purchasing in MARCH (last Wednesday ) we end up purchasing more REC's due to this issue , If Purchased excess kindly consider those excess REC's to carry forward for next financial year.

Devapur: 19.09.2023

**OBJECTOR** 

A.K.AGRAWAL AVP(Electrical)

Orient Cement Ltd

Mancherial.

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